

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

v.

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**GOVERNMENT'S RESPONSE TO DEFENDANT'S  
SECOND MOTION FOR A SUPPLEMENTAL BILL OF PARTICULARS**

The United States of America, by and through undersigned counsel, responds as follows to the second motion of defendant Concord Management and Consulting LLC for a supplemental bill of particulars, Doc. 264.

Paragraph 48 of the Superseding Indictment alleges that one of the ways in which the conspirators interfered with the lawful government functions of the Federal Election Commission and the Justice Department's Foreign Agents Registration Act ("FARA") Unit was by purchasing advertisements on U.S. social media advocating the election of then-candidate Donald Trump or opposing the election of then-candidate Hillary Clinton without reporting these expenditures to the Federal Election Commission and without registering as foreign agents under FARA. Doc. 247 ¶ 48. Paragraph 48 further alleges that the defendants also caused others to purchase such advertisements. *Id.*

As noted in Concord's motion, after the Superseding Indictment was returned, defense counsel asked the government for additional information on the allegations set forth in this paragraph. As the government has since explained to defense counsel, the government misunderstood the question that defense counsel was asking, and believed defense counsel to be

requesting information that the government had already provided. Upon reading Concord's motion, the government recognized its misunderstanding and contacted defense counsel to provide additional information about the allegations in paragraph 48. Defense counsel asked some follow-up questions, and the government has agreed to provide answers to those questions before the next status hearing.

In light of this exchange, the government respectfully requests that the Court defer ruling on Concord's motion while the government responds to defense counsel's inquiries. After the parties have conferred on this matter, the parties will advise the Court whether the defense intends to withdraw the motion or whether the government intends to file an opposition.

Respectfully submitted,

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